

EXHIBIT C

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

YORON COHEN,

Plaintiff,

v.

JONES LANG LASALLE AMERICAS,
INC., PETER RIGUARDI, and STEPHEN
SCHLEGEL,

Defendant.

No. 17-CV-03471

**DEFENDANT PETER RIGUARDI'S
RESPONSES AND OBJECTIONS TO
PLAINTIFF'S FIRST SET
OF REQUESTS FOR ADMISSION**

Pursuant to Rules 26 and 36 of the Federal Rules of Civil Procedure ("Fed. R. Civ. P.") and the Local Rules of the United States District Court for the Southern District of New York ("Local Rules"), Defendant Peter Riguardi (the "Defendant"), by and through his attorneys, Morgan, Lewis & Bockius LLP, hereby responds and objects to Plaintiff's Set of Requests for Admission (the "Requests"), in accordance with the numbered Requests as set forth below.

These responses and objections reflect Defendant's current knowledge and the results of its investigation to date. Defendant reserves the right to amend or supplement these responses in the future in accordance with Fed. R. Civ. P. 26(e)(1) as may be necessary or appropriate.

PRELIMINARY STATEMENT

1. The responses and objections contained herein (the "Responses") are made solely for the purpose of the above-captioned litigation ("Lawsuit") and are not to be used in connection with any other action.

2. The Responses reflect Defendant's knowledge, information, and belief as of the date of Response. Defendant may engage in further investigation, discovery, and analysis that may uncover additional information, add meaning to known facts and/or support new factual and

applicable privileges.

8. The Requests require the disclosure of confidential, proprietary, and/or business information concerning Defendant.

9. The Requests seek, in whole or in part, a legal theory, interpretation, or conclusion rather than a factual response and, therefore, are beyond the permissible scope of discovery.

10. The Requests seek, in whole or in part, information that is cumulative, redundant, and/or duplicative.

11. The Requests seek, in whole or in part, information that is equally accessible to, or in the possession of, Plaintiff and/or his counsel.

12. The Requests seek, in whole or in part, to impose obligations on Defendant beyond those prescribed by the Fed. R. Civ. P., the Federal Rules of Evidence, and this Court's Local Rules.

REQUESTS FOR ADMISSION

REQUEST FOR ADMISSION NO. 1: Admit that You communicated with The Real Deal in connection with the Article.

RESPONSE TO REQUEST FOR ADMISSION NO. 1: Admitted.

REQUEST FOR ADMISSION NO. 2: Admit that You told The Real Deal that members of Cohen's Team were "underperforming", or words to that effect.

RESPONSE TO REQUEST FOR ADMISSION NO. 2: Denied.

REQUEST FOR ADMISSION NO. 3: Admit that You told The Real Deal that members of Cohen's Team were told at a January 2016 meeting that "they were not doing enough to justify their lofty perches at JLL", or words to that effect.

RESPONSE TO REQUEST FOR ADMISSION NO. 3: Denied.

REQUEST FOR ADMISSION NO. 4: Admit that You told The Real Deal that JLL's sales division was "well behind the sharks at Eastdil Secured and CBRE", or words to that effect.

RESPONSE TO REQUEST FOR ADMISSION NO. 4: Denied.

REQUEST FOR ADMISSION NO. 5: Admit that You told The Real Deal that members of Cohen's Team were given an "Ultimatum in September: step it up, or leave in December upon the expiration of their contracts", or words to that effect.

RESPONSE TO REQUEST FOR ADMISSION NO. 5: Denied.

Dated: November 17, 2017

MORGAN, LEWIS & BOCKIUS LLP

/s Jason D. Burns

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Attorneys for Defendant

CERTIFICATE OF SERVICE

I hereby certify that I caused to be served by email and U.S. Mail a true and correct of Defendant Peter Riguardi's Responses and Objections to Plaintiff's First Set of Requests for Admissions on this 17th day of November, 2017 on:

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/s/ Jason D. Burns
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